

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CATHARINA BIANCO, as Executrix for the Estate
of FRANK BIANCO, and CATHARINA BIANCO,
Individually,

Plaintiff,

- against -

A.O. SMITH WATER PRODUCTS CO., et al.,

Defendants.

I.A.S. Part 11 (Madden, J.)

Index No. 115546-06

**AFFIRMATION OF SANDRA
K. STEINMAN IN SUPPORT
OF UNION CARBIDE
CHEMICALS AND PLASTICS
COMPANY, INC.'S MOTION
IN LIMINE**

This document relates to

Frank Bianco	Index No. 115546-06
Karl Felten	Index No. 114005-06
Christian Holinka	Index No. 114120-06
Frederick Ritzer	Index No. 111328-06
Joseph Saccomano	Index No. 113299-06

SANDRA K. STEINMAN, an attorney duly admitted to practice before the
courts of this state, affirms the following to be true under penalties of perjury:

1. I am an attorney with the law firm Anderson Kill & Olick, P.C.,
counsel in the above-captioned action for defendant Union Carbide Chemicals and
Plastics Company, Inc. I am fully familiar with the facts and circumstances set forth
herein.

2. I respectfully submit this affirmation in support of Union Carbide
Chemicals and Plastics Company, Inc.'s motion *in limine* for an order seeking to Union
Joinder to All Co-Defendants' Motions *In Limine* and Opposition to Plaintiff's Motions *In
Limine*, together with such other and further relief as the Court deems just and proper.

3. Based on all pleadings herein and argument to be made before this Court, Union Carbide Chemicals and Plastics Company, Inc.'s motion should be granted in its entirety.

WHEREFORE, Union Carbide Chemicals and Plastics Company, Inc. respectfully requests that this Court issue an Order granting Union Carbide Chemicals and Plastics Company, Inc.'s motion *in limine*, and for such other and further relief as the Court may deem just and proper.

Dated: New York, New York
August 22, 2007

ANDERSON KILL & OLICK, P.C.

By: 

Sandra K. Steinman
1251 Avenue of the Americas
New York, New York 10020-1182
(212) 278-1000

Attorneys for Union Carbide Chemicals and
Plastics Company, Inc.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

CATHARINA BIANCO, as Executrix for the Estate
of FRANK BIANCO, and CATHARINA BIANCO,
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Plaintiff,

- against -

A.O. SMITH WATER PRODUCTS CO., et al.,

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I.A.S. Part 11 (Madden, J.)

Index No. 115546-06

**DEFENDANT'S NOTICE OF
JOINDER AND JOINDER TO
ALL CO-DEFENDANTS'
MOTIONS *IN LIMINE* AND
OPPOSITIONS TO
PLAINTIFFS' MOTIONS *IN
LIMINE***

This document relates to

Frank Bianco	Index No. 115546-06
Karl Felten	Index No. 114005-08
Christian Holinka	Index No. 114120-06
Frederick Ritzer	Index No. 111328-06
Joseph Saccomano	Index No. 113299-06

TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:

Defendant Union Carbide Corporation (hereinafter "Union Carbide")

hereby join in each and every Motion *in Limine* exchanged, filed, and/or served by each
and every co-defendant and incorporate them by reference, as if the same were herein
set forth in full.¹

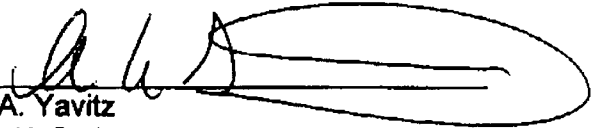
¹ At this time, there has been no identification of products containing Union Carbide's Calidria asbestos in any of the five cases represented by the above-styled caption. It is on this basis that Union Carbide submits this consolidated motion *in limine*. However, should Plaintiffs offer evidence of product identification that could implicate Union Carbide's Calidria asbestos in any of the five (5) cases, Union Carbide reserves the right to oppose the consolidation of said cases at that time.

Further, Union Carbide joins in each and every Opposition to Plaintiffs
Motions *in Limine* exchanged, filed, and/or served by each and every co-defendant and
incorporates them by reference, as if the same were herein set forth in full.

Dated: New York, New York
August 22, 2007

Respectfully submitted,

ANDERSON KILL & OLICK, P.C.



Judith A. Yavitz
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1251 Avenue of the Americas
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Attorneys for Union Carbide Chemicals and
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